

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

UNITED STATES OF AMERICA *ex rel.*
BROOK JACKSON,

Plaintiff,

V.

VENTAVIA RESEARCH GROUP, LLC;
PFIZER, INC.; ICON PLC

Defendants.

Civil Action No.: 1:21-cv-00008-MJT

STIPULATION REGARDING RELATOR'S SECOND AMENDED COMPLAINT

Relator Brook Jackson (“Relator”) and Defendants Pfizer Inc., Ventavia Research Group, LLC, and ICON plc (collectively, “Defendants”), by and through their counsel of record, submit the following stipulation regarding Relator’s proposed second amended complaint:

Subject to the Parties' positions and reserving all rights regarding the same,¹ the Parties stipulate to Relator filing a Second Amended Complaint ("SAC"), attached as **Exhibit A**, with the understanding that the Court previously dismissed the claims in Counts II, III, and IV with prejudice (ECF 96), and that those Counts are included in the SAC solely for purposes of preserving those claims for appeal.

¹ Defendants do not concede (and in fact adamantly dispute) that the factual contentions in the proposed second amended complaint have any evidentiary support, or that Relator is presenting the pleading for a proper purpose. Defendants reserve all rights with respect to these allegations.

Date: October 2, 2023

Respectfully Submitted,

/s/Warner Mendenhall

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Counsel for ICON plc

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023 a true and correct copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF system in accordance with this Court's Local Rules.

/s/Warner Mendenhall